

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	INDICTMENT	CR 11-250 DWF/JJG
)		
Plaintiff,)	(18 U.S.C. § 2)	
)	(18 U.S.C. § 1951(a))	
v.)	(18 U.S.C. § 924 (c))	
)	(28 U.S.C. § 2461 (c))	
JOSEPH LAURENCE FORLITI,)		
)		
Defendant.)		

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Interference with Commerce by Robbery - "Hobbs Act")

On or about June 14, 2011, in the State and District of Minnesota, the defendant,

JOSEPH LAURENCE FORLITI,

aiding and abetting with other persons, whose names are known and unknown to the grand jury, did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain property consisting of U.S. Currency from the person and presence of an employee of a SuperAmerica store, located in the City of White Bear Lake, Minnesota, against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property, that is, the defendant used a firearm to compel the employee of the

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RICHARD J. SUTTEN, CLERK

AUDOMAR ENTERED

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SuperAmerica store, a business engaged in interstate commerce, to relinquish to defendant U.S. Currency belonging to the business, all in violation of Title 18, United States Code, Section 1951(a).

COUNT 2

(Interference with Commerce by Robbery - "Hobbs Act")

On or about June 14, 2011, in the State and District of Minnesota, the defendant,

JOSEPH LAURENCE FORLITI,

aiding and abetting with other persons, whose names are known and unknown to the grand jury, did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain property consisting of U.S. Currency from the person and presence of an employee of a SuperAmerica store, located in the City of Maplewood, Minnesota, against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property, that is, the defendant used a firearm to compel the employee of the SuperAmerica store, a business engaged in interstate commerce, to relinquish to defendant U.S. Currency belonging to the business, all in violation of Title 18, United States Code, Section 1951(a).

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COUNT 3

(Possession of Firearm in Furtherance of
a Crime of Violence)

On or about June 14, 2011, in the State and District of
Minnesota, the defendant,

JOSEPH LAURENCE FORLITI,

during and in relation to a crime of violence for which may be
prosecuted in a court of the United States, that is the armed
robbery described in Count 1 of the Indictment, did knowingly use
and carry a firearm, all in violation of Title 18, United States
Code, Section 924(c).

COUNT 4

(Possession of Firearm in Furtherance of
a Crime of Violence)

On or about June 14, 2011, in the State and District of
Minnesota, the defendant,

JOSEPH LAURENCE FORLITI,

during and in relation to a crime of violence for which may be
prosecuted in a court of the United States, that is the armed
robbery described in Count 2 of the Indictment, did knowingly use
and carry a firearm, all in violation of Title 18, United States
Code, Section 924(c).

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FORFEITURE ALLEGATIONS

Counts 1 through 4 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in Counts 1 and 2 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Sections 2 and 1951(a).

Upon conviction of the offenses alleged in Counts 3 and 4 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), any firearm with accessories and any ammunition involved or used in any knowing violation of Title 18, United States Code, section 924(c).

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Sections 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

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All in violation of Title 18, United States Code, Sections 2, 924(c), 924(d)(1), and 1951(a), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON